

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

IN RE:) Bankruptcy Case No. 25-50041
) Chapter 7
JAMIE CLOER,)
)
Debtor.)
_____)

**TRUSTEE’S RESPONSE TO MOTION FOR RELIEF FROM STAY
BY U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION**

John W. Taylor, Trustee, hereby responds to the Motion for Relief from Stay filed by U.S. Bank Trust Company, National Association (“Motion”), requests a hearing thereon and says in support thereof:

1. On or about February 14, 2025, Jamie Cloer (the “Debtor”) filed a voluntary Chapter 7 bankruptcy petition in the United States Bankruptcy Court for the Western District of North Carolina; Bankruptcy Case No. 25-50041.
2. John W. Taylor, is the duly appointed and acting Chapter 7 Bankruptcy Trustee in the Debtor’s bankruptcy case.
3. The bankruptcy estate owns real property located at 315 Legion Road, Hudson, North Carolina (“Real Property”).
4. According to its Motion, U.S. Bank Trust Company, National Association has a lien on the Real Property in the amount of \$151,712.77.
5. There are no other liens on the Real Property known to the Trustee.
6. The Real Property has a current valuation of \$277,300.00 according to Zillow.com, \$282,900.00 according to Refin.com and \$271,571.00 according to Realtor.com.
7. Trustee requests that he be given additional time to investigate the value of the Real

Property and, if warranted, to market and sell the Real Property.

8. The apparent substantial equity in the Real Property constitutes adequate protection to 315 Legion Road, Hudson, North Carolina in the interim.

DATED this 24th day of March, 2025.

/s/ John W. Taylor

John W. Taylor, N.C. Bar No. 21378

Attorney for Trustee

4530 Park Road, Suite 490

Charlotte, NC 28209

(704) 540-3622

johntaylor@johntaylorlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM STAY BY U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION by either Electronic Case Filing as indicated or depositing copies of same in the exclusive care and custody of the United States Postal Service, with proper postage thereto affixed to the below listed parties this 24th day of March, 2025.

Kelly Dowd Tomasic, Attorney for Navy Federal
Credit Union

Via Electronic Case Filing

Jamie Cloer
315 Legion Rd
Hudson, NC 28638

/s/ John W. Taylor
John W. Taylor, N.C. Bar No. 21378
Attorney for Trustee
4530 Park Road, Suite 490
Charlotte, NC 28209
(704) 540-3622